

Exhibit 79

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
MDL-NO. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS ORAL DEPOSITION OF:

MARKETING, SALES PRACTICES, DANIEL L.
CLARKE-PEARSON, MD

AND PRODUCTS LIABILITY

VOLUME 1

LITIGATION

* * * *

THURSDAY, AUGUST 26, 2021

* * * *

MASTROIANNI & FORMAROLI, INC.
Certified Court Reporting & Videoconferencing
515 South White Horse Pike
Audubon, New Jersey 08106
856-546-1100

Page 2

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7 Transcript of proceedings in the
8 above matter taken stenographically by
9 Theresa Mastroianni Kugler, Certified Court Reporter,
10 license number 30X100085700, Notary Public of the
11 State of New Jersey and the Commonwealth of
12 Pennsylvania at The Notary Hotel, 21 N. Juniper
13 Street, Mezzanine 1, Philadelphia, Pennsylvania,
14 commencing at 10:05 AM.
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Page 4

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Page 3

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2 WITNESS INDEX
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4 EXAMINATION OF DR. CLARKE-PEARSON, MD
5

6 By MS. BROWN Page 10
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1 EXHIBITS

2 EXHIBITS ATTACHED TO THE END OF THIS TRANSCRIPT

3
4 Exhibit 1, notice of deposition of Dr. Daniel L.
Clarke-Pearson
5 Page 106
7 Exhibit 1A, amended notice of deposition of Dr.
Daniel L. Clarke-Pearson
8 Page 109 Exhibit 2, original Dropbox production of documents
responsive to deposition
10 Page 1111 Exhibit 3, supplement of Dropbox documents
12 Page 1113 Exhibit 4, binder of Dr. Daniel L. Clarke-Pearson
14 Page 1215 Exhibit 5, collection of notes and some miscellaneous
additional information separate from binder
16 Page 1617 Exhibit D-6, collection of the invoices
18 Page 2319 Exhibit 7, MDL report from November 16th, 2018
20 Page 4421 Exhibit 8, the amended report dated July 2nd, 2021
22 Page 4423 Exhibit 9, a red line amended report
24 Page 44
25

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1 Exhibit 21, email from Ed McCarthy dated October 21,
2 2012
3 Page 1964
5 Exhibit 22, article by Dr. Wong, et al, entitled:
Perineal Talc Exposure and Subsequent Epithelial
6 Ovarian Cancer: A Case-Control Study
7 Page 1998
9 Exhibit 23, publication by David Egilman, et al
titled: A Review of the Talc Industry's Influence on
Federal Regulation and Scientific Standards For
10 Asbestos in Talc
11 Page 20412 Exhibit 24, Dr. Clarke-Pearson's oral deposition
dated Monday, February 4, 2019
13 Page 20614 Exhibit 25, Expert Report of Daniel L.
Clarke-Pearson, MD on Hilary Converse
15 Page 26416 Exhibit 26, medical record for Hilary Converse
17 Page 33918 Exhibit 27, NCI PDQ
19 Page 34220 Exhibit 28, ProHealth Physicians of Hamden medical
record
21 Page 349
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1 Exhibit D-10, CV of Dr. Daniel L. Clarke-Pearson
dated June 22, 2021
2 Page 453 Exhibit 11, email correspondence
4 Page 655 Exhibit 12, email correspondence with SGO
6 Page 657 Exhibit 13, slide presentation
8 Page 1559 Exhibit 14, Exhibit B to the amended report
10 Page 17111 Exhibit 15, red line report
12 Page 17113 Exhibit 16, most recently updated reliance list
14 Page 18015 Exhibit 17, red line to the previous updated reliance
list
16 Page 18017 Exhibit 18, letter from Dr. Jerrold L. Abraham dated
August 25, 1997
18 Page 18919 Exhibit 19, US Public Health Service document from
1948
20 Page 19121 Exhibit 20, IMERY'S document dated May 23, 2002
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1 REQUESTS

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5 REQUEST.....Page 20

6 REQUEST.....Page 26

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15 REQUEST.....Page 251

16 REQUEST.....Page 264
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19 MARKED

20 Marked by Ms. Parfitt at Page 233
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Page 272

[illegible]

Page 271

Year	Number of Publications
1	1
2	1
3	1
4	1
5	1
6	1
7	1
8	1
9	1
10	1
11	1
12	1
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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] objection.

23 [REDACTED]

[REDACTED]

[REDACTED] ROWN:

Pages 270 to 273

Daniel L. Clarke-Pearson, MD

August 26, 2021

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BY MS. BROWN:

23 [REDACTED]
[REDACTED]
[REDACTED]

[illegible]

11 MS. BROWN: Could we take a look at tab
12 37, please?
13 (Exhibit 26, medical record for Hilary
14 Converse, is marked for identification)
15 BY MS. BROWN:
16 Q. [REDACTED]

[illegible][illegible]

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[illegible]

Category	Value (Estimated %)
1	95
2	90
3	95
4	80
5	100
6	55
7	45
8	40
9	90
10	95
11	100
12	15
13	50
14	95
15	95
16	80
17	90
18	65
19	95
20	45
21	90
22	95
23	85
24	95
25	60

114

[illegible]

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Category	Value (approximate relative length)
1	0.4
2	0.8
3	0.9
4	0.85
5	0.85
6	0.8
7	0.95
8	0.9
9	0.85
10	0.8
11	0.8
12	0.8
13	0.8
14	0.8
15	0.8
16	0.8
17	0.8
18	0.8
19	0.8
20	0.8

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